

Exhibit A-15

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

-against-

ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,

Defendants,

-and-

DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

DEFENDANT ROBERT J. MUELLER'S EXPERT DESIGNATIONS

Defendant Robert J. Mueller ("**Defendant**") hereby submits his Expert Designations pursuant to Rule 26 of the Federal Rules of Civil Procedure, and provides notice of the following experts who may be called to testify at trial in this matter:

1. Dennis Concilla
c/o Matt Brown
Carlile Patchen & Murphy, LLP
950 Goodale Blvd., Suite 200
Columbus, OH 43212

Dennis Concilla is Of Counsel to the law firm of Carlile Patchen & Murphy LLP ("**Carlile Patchen**"). Mr. Concilla's education and experience are available through Carlile Patchen's

website, <cpmlaw.com/people/dennis-jconcilla/>. Mr. Concilla provided legal advice to Defendant regarding the drafting of Private Placement Memoranda (“**PPMs**”) and other materials provided to investors, among other subjects. Mr. Concilla is expected to provide relevant factual testimony in this litigation and, to the extent that any such testimony can be characterized as expert opinion testimony, he is being designated as a non-retained expert witness. Mr. Concilla has not been specially employed by Defendant to provide expert testimony in the case and is not a person whose duties regularly involved giving expert testimony.

Among other subjects, Mr. Concilla may testify regarding the customs and practices in the financial services industry concerning the drafting of PPMs and other materials provided to investors, as well as the role of attorneys and other experts in such processes. Mr. Concilla may also testify regarding the customs, practices, and processes of the Securities and Exchange Commission (“**SEC**”) in approving applications presented to the SEC and in enforcing the securities laws. Mr. Concilla may also testify regarding customs and practices concerning the management, oversight, design, and regulation of funds that involve life insurance policies. Finally, Mr. Concilla may testify regarding the opinions offered by other experts designated in this case.

Mr. Concilla is expected to base his opinions on his education, his professional experiences, his personal knowledge regarding the PPMs relevant to this case, his communications with witnesses and other experts detailed herein, and documents produced in discovery in this matter.

2. Andrew J. Federico
c/o Matt Brown
Carlille Patchen & Murphy, LLP
950 Goodale Blvd., Suite 200
Columbus, OH 43212

Andrew Federico is an attorney with Carlile Patchen. Mr. Federico's education and experience are available through Carlile Patchen's website, <cpmlaw.com/people/andrew-j-federico/>. Mr. Federico provided legal advice to Defendant regarding the drafting of PPMs and other materials provided to investors, among other subjects. Mr. Federico is expected to provide relevant factual testimony in this litigation and, to the extent that any such testimony can be characterized as expert opinion testimony, he is being designated as a non-retained expert witness. Mr. Federico has not been specially employed by Defendant to provide expert testimony in the case and is not a person whose duties regularly involved giving expert testimony.

Among other subjects, Mr. Federico may testify regarding the customs and practices in the financial services industry concerning the drafting of PPMs and other materials provided to investors, as well as the role of attorneys and other experts in such processes. Mr. Federico may also testify regarding the customs, practices, and processes of the SEC in evaluating applications presented to the SEC and in enforcing the securities laws. Mr. Federico may also testify regarding customs and practices concerning the management, oversight, design, and regulation of funds that involve life insurance policies. Finally, Mr. Federico may testify regarding the opinions offered by other experts designated in this case.

Mr. Federico is expected to base his opinions on his education, his professional experiences, his personal knowledge regarding the PPMs relevant to this case, his communications with witnesses and other experts detailed herein, and documents produced in discovery in this matter.

3. Robert J. Mueller
c/o Jason Davis
Davis & Santos, PLLC
719 S. Flores St.
San Antonio, TX 78204

Mr. Mueller is a Defendant in this matter. Mr. Mueller's education and experience have been detailed in documents already produced in discovery. Mr. Mueller is expected to provide relevant factual testimony in this litigation and, to the extent that any such testimony can be characterized as expert opinion testimony, he is being designated as a non-retained expert witness. Mr. Mueller has not been specially employed to provide expert testimony in the case and is not a person whose duties regularly involved giving expert testimony.

Among other subjects, Mr. Mueller may testify regarding customs and practices in the financial services industry, including concerning the manner in which investments were secured by entities and/or funds like those at issue in this litigation. Mr. Mueller may also testify regarding customs and practices concerning the management, oversight, design, and regulation of funds that involve life insurance policies. Mr. Mueller may also testify regarding the customs and practices in the pinball industry regarding the design, manufacture, marketing, and sale of pinball games. Mr. Mueller may also testify regarding the opinions offered by other experts designated in this case.

Mr. Mueller is expected to base his opinions on his education, his experience in the securities and pinball industries, his communications with witnesses and other experts detailed herein, and documents produced in discovery in this case.

4. Craig Rushforth
2983 North 4000 East
Sugar City, ID 83448
(210) 291-7555

Mr. Rushforth is a Facility Engineer for Pharmedica Idaho. He previously served as the Vice President and Lead Mechanical Engineer for Deeproot Tech, LLC. Prior to that time, Mr. Rushforth worked as a mechanical engineer for approximately eight years. Mr. Rushforth has a B.S. in Mechanical Engineering from Brigham Young University – Idaho. Mr. Rushforth is

expected to provide relevant factual testimony in this litigation and, to the extent that any such testimony can be characterized as expert opinion testimony, he is being designated as a non-retained expert witness. Mr. Rushforth has not been specially employed to provide expert testimony in the case and is not a person whose duties regularly involved giving expert testimony.

Among other subjects, Mr. Rushforth may testify regarding the processes, procedures, and technical issues regarding the design and manufacture of pinball machines, including the pinball machines relevant to this litigation. Mr. Rushforth may also testify regarding the time necessary to complete the pinball machines at issue in this litigation and the revenues that were expected from the sales of those machines.

Mr. Rushforth is expected to base any opinions on his education, his experience as an engineer and in the pinball industry, his communications with witnesses and other experts detailed herein, and documents produced in discovery in this case.

Dated: April 6, 2023.

Respectfully submitted,

DAVIS & SANTOS, PLLC

By: /s/ Jay Hulings

Jason M. Davis

Attorney-In-Charge

Texas State Bar No. 00793592

Email: jdavis@dslawpc.com

H. Jay Hulings

Texas State Bar No. 24104573

Email: jhulings@dslawpc.com

719 S. Flores Street

San Antonio, Texas 78204

Tel: (210) 853-5882

Fax: (210) 200-8395

Attorneys for Defendant Robert J. Mueller

CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2023, the foregoing document was served on counsel of record via email.

/s/ Jay Hulings

H. Jay Hulings